

October 28, 2022

Mr. Iola Metuq
President
Nunavik Marine Region Wildlife Board
PO Box 433
Inukjuak QC
J0M 1M0

Dear Mr. Metuq:

Thank you for your letter of September 1, 2022, informing me of the initial decision of the Nunavik Marine Region Wildlife Board (NMRWB) to remove the annual December 1 - January 31 closure of beluga hunting in Hudson Strait.

I have carefully analyzed your decision, as well as the potential implications of the proposed change. I would like to reiterate the importance of protecting Indigenous harvesting rights, and the principles of conservation that underpin the wildlife management systems in the Nunavik Inuit Land Claims Agreement (NILCA). It is only by working toward both of these objectives at the same time that we can succeed.

As you know, the 2021-2026 beluga management plan seeks to balance the needs of Inuit harvesters and the need to rebuild the Eastern Hudson Bay (EHB) beluga stock, which was assessed as threatened by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC) in 2020. The new management regime relies less on total allowable take and places increased emphasis on non-quota limitations to achieve its management objectives, particularly during the fall hunt in the Hudson Strait area. Given how transformational the new management approach is, changes in harvesting patterns are difficult to predict and there is some risk in changing management measures too quickly. Thus, careful consideration must be given to any modification or withdrawal of a management measure aimed at controlling effort.

I am very concerned that, despite our joint efforts, the harvest of EHB beluga has continued to greatly exceed the target level identified to meet the management plan's goals and rebuild the EHB stock. I am concerned that the removal of the winter closure could potentially compound the risk of EHB belugas overharvest since there is some scientific evidence of their presence in the Eastern part of Hudson Strait during the winter closure, especially in December. I also appreciate your argument that the presence of the closure may push the

harvest earlier in the season, when EHB belugas are more likely to be encountered in the area and therefore represent a higher proportion of the harvest.

I am willing to support the removal of the Hudson Strait winter closure and accept your decision. However, I would like to take this opportunity to emphasize the importance of the submission of biological samples from all belugas harvested in Nunavik, as required under the management plan, including from any potential harvest in December and January. This would allow my department to better assess the impact of this change on the proportion of EHB beluga included in the harvest during that period.

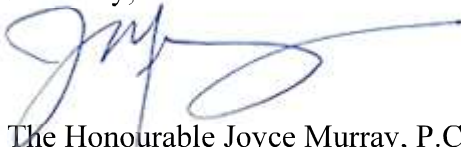
Maintaining the health of beluga stocks and rebuilding the EHB stock must be a shared priority. The restoration and revitalization of depleted populations of wildlife is one of the principles of conservation that serve as a foundation for wildlife management under the NILCA. Given the status of the EHB beluga stock, I am deeply concerned about any increase in harvest from the stock, as observed in the first year of implementation of the new management plan. In 2021, the recommended harvest threshold of 58 EHB belugas was significantly exceeded with a total take of 96 animals, of which 85 were taken as early as mid-November.

This overharvest represents an important management matter and this is why, on the basis of section 5.5.23 of the NILCA, I ask that you submit, to the Department, additional measures that would effectively protect EHB beluga from harvest and help to achieve the plan's management objective. Departmental officials can work with you in the identification of these measures. These additional measures should be submitted at the earliest opportunity, for an implementation of these measures before the fall of 2023.

As we work together toward successful co-management, I anticipate that the most effective approaches to beluga management will rely on a mix of measures adopted through the Board-Minister system, and those included in a hunting plans or rules developed by each Local Nunavimmi Umajulirijiit Katujiqatigininga (LNUK) in collaboration with the Regional Nunavimmi Umajulirijiit Katujiqatigininga (RNUK), in accordance with the roles and authorities described in sections 5.7.2 and 5.7.4 of the NILCA.

I would like to reaffirm the Department's commitment to work together, in the spirit of co-management, with the representatives of the Board, the RNUK, the LNUKs and Makivik, to continue to refine and implement an effective beluga management system in the Nunavik Marine Region.

Sincerely,



The Honourable Joyce Murray, P.C., M.P.
Minister of Fisheries, Oceans and the Canadian Coast Guard

cc : Mr. Tommy Palliser, Executive Director, NMRWB